



Air Quality Permitting Statement of Basis

December 17, 2003

Tier I Operating Permit No. T1-030133

Moyie Springs Lumber Company LLC, Moyie Springs

Facility ID No. 021-00001

Prepared by:

*Shawnee Chen P.E., Senior Engineer
Technical Services Division*

FINAL PERMIT

Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pound per hour
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NO _x	nitrogen oxides
PTC	permit to construct
SIC	Standard industrial classification
SO ₂	sulfur dioxide
T/yr	tons per year
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.300 et seq, *Rules for the Control of Air Pollution in Idaho*, for issuing Tier I operating permits.

2. FACILITY DESCRIPTION

Moyie Springs Lumber Company (Moyie Springs) operates a dimensional lumber company. The manufacturing processes are described as follows.

Logs are delivered by haul trucks to the Moyie Springs facility, and are unloaded and temporarily stored. The first step in the manufacturing process involves the removal of bark from the delivered logs in one of two ring debarkers. The bark is then mechanically conveyed through a hog to the fuel mix bin. After the debarkers, the logs are trimmed in length prior to entering the studmill. The log sawing operations within the studmill reduce the logs to desired dimensions. Sawdust and green chips are by products of the studmill operation. Sawdust is either mechanically conveyed to the bark hog for use as a fuel or is pneumatically transferred to overhead truck bins for off-site sales. Chips are transferred off-site either by truck or railcar.

The Moyie Springs mill dries primarily green lumber cut at the mill, but has the capacity to dry green lumber from off-site sales. All lumber is dried in one of four dry kilns. Steam from a boiler is used to heat the kilns. The boiler produces 75,000 pounds of steam per hour and is fueled primarily with a mixture of sawdust and bark. On occasion, planer shavings are used as fuel (approx. 220 bdt/yr). After drying, the wood is planed to final dimensions in the planer mill in one of two high-speed planers. Shavings from each of the planers are pneumatically transferred to overhead truck bins through separate cyclonic collectors, followed by rotary air locks and baghouses.

The planed lumber is then trimmed to marketable length. Trim ends are reduced in a hog and are pneumatically transferred to the overhead truck shavings bins along with the shavings. The lumber is then graded, inked, stacked, and banded. A low volatile organic compound water seal is applied to the ends of the lumber. The lumber is then stored until it is shipped off-site by rail or truck.

3. FACILITY/AREA CLASSIFICATION

The facility is classified as major, in accordance with IDAPA 58.01.01.008.10, for Tier I permitting purposes because the facility has the potential to emit CO and PM in amounts over 100 T/yr. There is not a source-specific MACT requirement promulgated for this source category. Hazardous air pollutants are not emitted above major facility thresholds according to the applicant's submittal. The facility is not a designated facility in accordance with IDAPA 58.01.01.006.27. The SIC defining the facility is 2421 and the AIRS facility classification is A.

The facility is located within AQCR 63, and in Boundary County. The area is classified as attainment or unclassifiable for all federal and state criteria pollutants. There are no Class I areas within 10 km of the facility.

4. APPLICATION SCOPE

The purpose of this permitting is an administrative amendment to an existing Tier I operating permit. The administrative amendment includes the following changes as applied for in their October 1, 2003 permit application; facility name change, responsible official name change, and facility contact name change.

4.1 Application Chronology

10/01/03 DEQ received an application for an Tier I operating permit administrative amendment.

5. PERMIT ANALYSIS

5.1 Emissions Inventory

There are no emission changes associated with this permitting action. However, a summary of the facility's potential to emit is shown in Tables 5.1.

Table 5.1. ESTIMATED POTENTIAL TO EMIT

Moyie Springs Lumber Company LLC	
Pollutant	Emission rates (T/yr)
PM/PM ₁₀	209.1
CO	220.9
VOC	200.9
SO ₂	7.13
NO _x	71.25
TOTAL	709.3

5.2 Modeling

Air dispersion modeling is not required for this permitting action.

5.3 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to Tier I operating requirements.

IDAPA 58.01.01.381 Tier I Administrative Permit Amendments

The permittee submitted a request to DEQ for an administrative permit amendment. The amendments requested are the following: facility name change, responsible official name change, and facility contact name change. This action is an administrative permit amendment in accordance with IDAPA 58.01.01.381.

5.4 Fee Review

Moyie Springs is current with their registration and registration fees in accordance with IDAPA 58.01.01.387.

6. PERMIT CHANGES AND PERMIT CONDITIONS

Administrative Permit Amendments

Tier I Operating Permit

In accordance with Moyie Springs October 1, 2003 application, Moyie Springs has completed the purchase of the Louisiana-Pacific Corp., Moyie Springs Facility. The Tier I permit has been administratively amended to reflect the facility name change, the responsible official name change and the facility contact name change. Those were the only changes made to the permit.

Permit Conditions

No changes were made to any permit condition contained in the existing Tier I operating permit as part of this permitting action.

7. PUBLIC COMMENT

Administrative permit amendments made pursuant to IDAPA 58.01.01.381 do not require public or affected states notice.

8. RECOMMENDATION

Based on the review of the application materials, and all applicable state and federal regulations, staff recommends that DEQ issue administratively amended Tier I Operating Permit No. T1-030133 to Moyie Springs Lumber Company LLC..

SYC/sd T1-030133

G:\Air Quality\Stationary Source\SS Ltd\T1\Moyie Springs Lumber\Amendment - Final\T1-030133 Final SB.doc

APPENDIX A

AIRS/AFS INFORMATION TABLE^c

T1-030133

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION
POLLUTANT							A – Attainment U – Unclassifiable N – Nonattainment
SO ₂	B						U
NO _x	B						U
CO	A					A	U
PM ₁₀	A					A	U
PT (Particulate)	A					A	N/A
VOC	A					A	U
THAP (Total HAPs)	A					A	N/A
			APPLICABLE SUBPART				

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.

SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.

B = Actual and potential emissions below all applicable major source thresholds.

C = Class is unknown.

ND = Major source thresholds are not defined (e.g., radionuclides)

^c PTC No. P-030119, July 30, 2003, Technical Memorandum